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7 Chapter 9 Counsel

8 IN THE UNITED STATES BANKRUPTCY COURT

9 EASTERN DISTRICT OF CALIFORNIA

10 FRESNO DIVISION

11 In re

CASE NO. 17-13797

12 TULARE LOCAL HEALTHCARE
13 DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER,

Chapter 9

14 Debtor.

15
16 HEALTHCARE CONGLOMERATE
ASSOCIATES, LLC,

Adv. No.: 17-01095

17 v.

DC NO.: OHS-1

18 Plaintiff,
19
20 TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER; DOES 1 through
20,

STIPULATION TO CONTINUE HEARING
AND RESPONSE DATE ON MOTION
FOR REMAND OF LAWSUIT TO STATE
COURT PURSUANT TO 28 U.S.C. §
1452(b)

21 Defendants.

Date: March 12, 2018
Time: 10:30 a.m.
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

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RECEIVED

February 27, 2018
CLERK, U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
0006228972

Hearing and Response Date re Motion
to State Court

1 IT IS HEREBY STIPULATED AND AGREED by and between Healthcare
2 Conglomerate Associates, LLC and Tulare Local Healthcare District, by counsel, as
3 follows.

4 1. On December 28, 2017 Tulare Local Healthcare District removed to this
5 court an action ("Removed Action") that had been filed in the Superior Court for the
6 County of Los Angeles.

7 2. On January 24, 2018 Healthcare Conglomerate Associates, LLC filed a
8 Motion for Remand of Lawsuit to State Court Pursuant to 28. U.S.C. § 1452(b), D.C. No.
9 OHS-1, which is presently set for hearing on March 12, 2018 at 10:30 a.m.

10 3. On January 29, 2018 Healthcare Conglomerate Associates, LLC filed a
11 Motion to Dismiss Counterclaim Against HCCA or in the Alternative Strike Portions
12 Thereof, D.C. No. OHS-2, and Motion to Strike Portions of Answer of Tulare Local
13 Healthcare District dba Tulare Regional Medical Center, D.C. No. OHS-3, which are
14 now each set for hearing on April 5, 2018 at 11:00 a.m.

15 4. The parties have discussed these matters and agree that the hearing on
16 the Motion to Remand of Lawsuit to State Court Pursuant to 28. U.S.C. § 1452(b) will be
17 continued to April 5, 2018 at 11:00 a.m. Tulare Local Healthcare District's response to
18 such Motion shall be due on March 22, 2018 and the reply of Healthcare Conglomerate
19 Associates, LLC shall be due March 29, 2018.

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1 5. The parties stipulate and agree to entry of a court order approving this
2 stipulation.

3 IT IS SO STIPULATED.

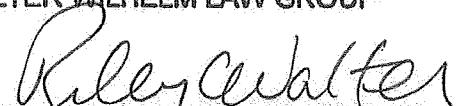
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5 KLEIN, DeNATALE, GOLDNER, ROSENLIB
6 & KIMBALL LLP; and

7 ORRICK, HERRINGTON & SUTCLIFFE LLP

8 By: 

9 Marc A. Levinson, Attorneys for
10 Healthcare Conglomerate Associates, LLC

11 WALTER WILHELM LAW GROUP

12 By: 

13 Riley C. Walter, Attorneys for
14 Tulare Local Healthcare District

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24 Dated: Feb 27, 2018

25 By the Court

26 
27 René Lastreto II, Judge
28 United States Bankruptcy Court